

## **EXHIBIT 2**

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

UMG RECORDINGS, INC., et al., )  
Plaintiffs, )  
vs. ) No. 1:17-cv-00365-DAE-AWA  
GRANDE COMMUNICATIONS )  
NETWORKS LLC, )  
Defendant. )

**DEFENDANT GRANDE COMMUNICATIONS NETWORKS LLC'S  
STATEMENT OF CLAIMS OR DEFENSES**

Pursuant to Local Rule CV-16(f) and the Court's Order Setting Jury Selection/Trial and Related Deadlines (ECF No. 366), Defendant Grande Communications Networks, LLC, ("Grande") submits the following statement of its claims or defenses to be used in voir dire:

Grande disputes the plaintiffs' claim that Grande is liable for acts of copyright infringement allegedly committed by its subscribers. Grande asserts that it is merely an internet service provider and never induced or encouraged anyone to infringe the plaintiffs' copyrights. Grande contends that Rightscorp, which claims to have detected copyright infringement on Grande's network, cannot accurately or reliably identify infringement, and that Rightscorp destroyed or otherwise failed to preserve the evidence of its alleged detections. Grande also contends that Rightscorp's emails to Grande were flawed and unreliable, because of defects in Rightscorp's system and because the emails lacked any supporting or verifiable evidence. Grande therefore contends that the plaintiffs are not entitled to recover any damages, and furthermore, that the plaintiffs' requested damages are excessive and not supported by evidence of actual harm.

Dated: December 28, 2021

By: /s/ Richard L Brophy

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